Amendments to the Drawings:

The attached replacement sheets of drawings replaces the original sheets of drawings, which were informal.

Attachments following last page of this Amendment:

Replacement Sheets (7 pages)

REMARKS

The drawings were objected to by the examiner because the text was difficult to read.

Applicant has enclosed herewith replacement drawing sheets in compliance with 37 C.F.R. 1.121(d) in response to this requirement. No new matter has been added.

Specification

The examiner objected to the disclosure because of informalities. The examiner stated: "there are numerous grammatical errors throughout the specification and claims."

Applicant has reviewed the specification and claims and has made appropriate corrections, as required.

If the examiner can point out any specific corrections overlooked by Applicant, Applicant will promptly correct them.

Claim Objections

Claims 4, 18, and 31 were objected to because of the following informalities: "the follow-up messages" recited in the claims lack antecedent basis."

Applicant has amended these claims to depend from claims 3, 17, and 30, respectively.

The examiner objected to Claims 6 and 20 because of the following informalities:

> The claims recite the limitations "in conjunction with the match" and "text produced from the match". There is insufficient antecedent basis for these limitations in the claims. Nowhere in claims 1 or 15, or anywhere else in the disclosure, is it made clear as to what is being "matched" or what text this "match" will produce. For examination purposes, the match will be regarded as the response generated in claims 1 and 15, respectively.

Claim 6, as amended, now calls for ... searching a database for content related to the transaction request; and animating the avatar with a voice and facial movements corresponding the content found in the database. Support for these amendments can be found on page 4, line 22-31; page 6, line 3 to page 7, line 24.

Similar amendments have been made to claim 20.

Claim Rejections - 35 U.S.C. § 102

Claims 1, 2, 6-16, and 19-29 are rejected under 35 U.S.C. 102(e) as being anticipated by Bennett U.S. Pat. No. 7,050,977.

Claim 1 is neither described nor suggested by Bennett. Claim 1 calls for "... receiving a transaction request from a user as text input, using natural programming language to analyze the text input to build a conversation with the user based on the transaction request, conducting a transaction with the user based on the text input, ..." At least these features are neither described nor suggested by Bennett.

The examiner stated:

> Regarding claim 1, BENNETT teaches a method of conducting commerce ("ecommerce applications", column 8, lines 44-45) comprising:
> receiving a transaction request from a user as text input ("outputs recognized speech text corresponding to the user's question", column 11, lines 14-15);
> using natural programming language to analyze the text input to build conversations with the user based on the transaction request ("natural language engine 190 facilitates structuring the query to database 188", column 11, lines 20-22);
> conducting the transaction with the user based on the text input ("retrieves an appropriate answer", column 11, line 19);
> generating a voice-synthesized response in accordance with the transaction through an avatar ("expressed as oral feedback by animated character agent 157", column 11, lines 25-26); and
> tracking the transaction by storing the transaction in the database ("noun phrases of the string are stored", column 25, line 7).

The examiner contends that the feature of receiving a transaction request from a user as text input is shown by "receiving a transaction request from a user as text input ("outputs recognized speech text corresponding to the user's question", column 11, lines 14-15)."

Applicant disagrees. Bennett also describes that: "Initially speech input is provided in the form of a question or query articulated by the speaker at the client's machine or personal accessory as a speech utterance."[1] This clearly shows that Bennett does not describe "receiving a transaction request from a user as text input," as called for in claim 1.

The examiner contends that the feature in claim 1 "...using natural programming language to analyze the text input to build a conversation with the user based on the transaction

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[1] Bennett, Col. 10, lines 63-65.

request, conducting a transaction with the user based on the text input, ... " is shown as Col. 11 lines 20-22. Applicant disagrees. Bennett discloses: "A Natural Language Engine 190 facilitates structuring the query to database 188. After a matching answer to the user's question is found, the former is transmitted in text form across data link 160B, where it is converted into speech by text to speech engine 159, and thus expressed as oral feedback by animated character agent 157." However, the NLE 190, as taught by Allen, is merely used to structure a query not to build a conversation with the user based on the transaction, as called for in Claim 1.

Claim 2, includes the feature of "searching a database to find related information associated with conducting the transaction." The examiner contends that this is taught by "...("set of potential questions corresponding to the user's query are received as a result of a full-text search", column 25, lines 15-16)." Applicant disagrees. This passage relied on by the examiner is directed to the processing involved in processing of a user query. It is not related to finding related information associated with conducting the transaction.

Claim 6, includes the feature of "...searching a database in conjunction with the match..." The examiner again relies on ("set of potential questions corresponding to the user's query are received as a result of a full-text search", column 25, lines 15-16);" as set out above. However, as applicant contends this is not shown by Bennett.

Claim 8, requires animating comprises natural language programming techniques to develop and build conversations between the user and the avatar. Bennett neither describes nor suggests to build conversations with the avatar whether by "... ("an environment that emulates a normal conversational human-like question and answer dialog", column 36, lines 28-29)" or elsewhere..

Claim 9, distinguishes over Bennett, since the reference neither describes nor suggests "that receiving the text input is in response to a suggestion generated by the avatar," whether by ("told by character 1440 about how to elicit the information required", column 36, lines 14-15)." or elsewhere. Bennett does not suggest to receive text, as generally argued for claim 1.

Claims 7, 10-14 are allowable at least for the reasons discussed in claim 1.

Claims 15, 16, and 19-29 contain analogous limitations and are allowable for analogous reasons as discussed above.

35 U.S.C. § 103

The examiner rejected Claims 3-5,17, 18, 30, and 31 under 35 U.S.C. 103(a) as being unpatentable over BENNETT (Patent No.: US 7,050,977) in view of SMITH et al. (Patent No.: US 6,853,982).

These claims are directed to follow-up questions and the examiner acknowledges that these are not taught by Bennett.

The examiner stated

> Regarding claim 3, BENNETT teaches all of the claimed limitations of claim 1. However BENNETT does not specifically disclose the generation of follow-up messages.
> In the same field of e-commerce, SMITH teaches generating follow-up messages to send to the user ("generates a list of additional items that are predicted to be of interest to the user", column 7, lines 30-32) that are based on added information stored in the database (see column 9, lines 37-52, a list of information used to generate the recommendation).
> Therefore, it would have been obvious to a person of ordinary skill in the art at the time the invention was made to use the recommendation system of SMITH with the e-commerce system of BENNETT so that the received messages will be relevant to the current browsing session (see SMITH, column 1, lines 10-12).

Applicant contends that by relying on Smith to teach follow-up questions that the examiner vitiates the previous rejection. Without conceding that there exists any proper motivation to combine Bennett with Smith, Applicant contends that the purported combination makes it clear that Bennett does not build a conversation, as claimed and in any event the purported combination neither describes nor suggests the features of these claims.

Smith does not teach follow-up questions as in claim 3 or the more general feature of building a conversation as in claim 1. Accordingly, claim 3 and claims 4 and 5 are allowable over the combination. Similarly claims 17, 18, 30 and 31 are allowable over the combination of Bennett with Smith.

It is believed that all the rejections and/or objections raised by the examiner have been addressed.

In view of the foregoing remarks, applicant respectfully submits that the application is in condition for allowance and such action is respectfully requested at the examiner's earliest convenience.

All of the dependent claims are patentable for at least the reasons for which the claims on which they depend are patentable.

Canceled claims, if any, have been canceled without prejudice or disclaimer.

Any circumstance in which the applicant has (a) addressed certain comments of the examiner does not mean that the applicant concedes other comments of the examiner, (b) made arguments for the patentability of some claims does not mean that there are not other good reasons for patentability of those claims and other claims, or (c) amended or canceled a claim does not mean that the applicant concedes any of the examiner's positions with respect to that claim or other claims.

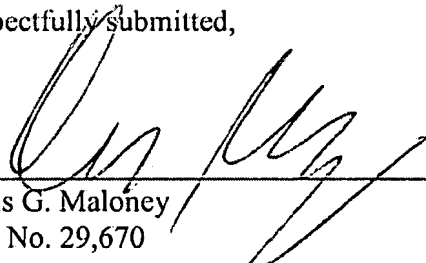No fee is due. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 8/30/07

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